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*Trustee*

5 **UNITED STATES BANKRUPTCY COURT**  
6 **DISTRICT OF NEVADA**

7 In re

8 ELIZABETH ANN RAMSEY

9 Debtor.

Case No. BK-S-21-10230-MKN

Chapter 7

10 TRUSTEE'S SUPPLEMENTAL REPLY  
11 BRIEF IN SUPPORT OF MOTION TO SELL  
12 REAL PROPERTY, PAY COMMISSION  
13 AND NORMAL CLOSING COSTS  
(1201 WESTLUND DRIVE, LAS VEGAS,  
NV 89102)

Date: May 24, 2023  
Time: 2:30 p.m.

14  
15 LENARD E. SCHWARTZER, Trustee for the bankruptcy estate of ELIZABETH ANN  
16 RAMSEY aka ELIZABETH RAMSEY, supplements his reply to the DEBTOR'S OPPOSITION  
17 TO THE CHAPTER 7 TRUSTEE'S MOTION TO SELL as follows:

18 The Debtor has no standing to object to the Trustee's Motion to Sell because the Debtor  
19 has no possessory or financial interest in 1201 WESTLUND DRIVE, LAS VEGAS, NV 89102  
20 (the "Property"). This Court previously ordered that Debtor had no right to claim a homestead  
21 exemption for the Property [ECF 63] (unappealed), denied the Debtor's request to convert this  
22 case to Chapter 13 [ECF 93] (unappealed), denied the Debtor's motion for abandonment of the  
23 Property [ECF 120] (unappealed), and ordered that the Debtor must vacate the Property by June  
24 13, 2023 [ECF 127] (unappealed). The Debtor has no interest in the Property or continued  
25 occupancy of the Property. For that reason, the Debtor lacks standing to object to the sale of the  
26 Property.

27 It turns out that the Property lacks equity because of its current condition. The Trustee was  
28 finally allowed access to the Property on Saturday, May 13, 2023. That inspection revealed that

1 the Property had the following defects:

- 2 a. Fireplace not working
- 3 b. Kitchen plumbing that flooded the house, particularly, the pantry area
- 4 c. Water line to master bedroom bathroom broken
- 5 d. Sinks removed from master bedroom bathroom
- 6 e. Water damage to ceilings and arched doorways
- 7 f. Lack of covers on HVAC vents
- 8 g. Peeling paint on eaves

9  
10 DATED: May 22, 2023.

11 /s/ Lenard E. Schwartzer  
12 LENARD E. SCHWARTZER  
Trustee

13 **DECLARATION OF TRUSTEE**

14 I declare, under penalty of perjury, that the foregoing is true and correct, to the best  
15 of my knowledge, information and belief.

16  
17 DATED: May 22, 2023.

18 /s/ Lenard E. Schwartzer  
19 LENARD E. SCHWARTZER